

The Court will hold a hearing on any remaining issues concerning the motion to compel [Doc. 19] on **WEDNESDAY, DECEMBER 21, 2022, at 3:00 p.m. at the United States District Courthouse, 4th Floor Courtroom, Chattanooga, Tennessee.**¹

To assist the Court in more efficiently addressing the motion to compel [Doc. 19], the parties shall meet and confer in person, by telephone, or by video conference, and jointly complete the following chart (or provide the requested information in some similar form). The purpose of the chart is to narrow the items in dispute and succinctly state each party's position with respect to any remaining item(s) in dispute, with an explanation for each item regarding the last compromise offered when the parties met and conferred. The fully completed chart shall be emailed to chambers at lee_chambers@tned.uscourts.gov at least **48 HOURS** prior to the scheduled hearing. **The conferring attorneys must appear at the hearing in person.** If the parties are able to resolve their dispute in its entirety, they may file an appropriate notice on the docket in lieu of the completed chart.

Discovery request at issue (list separately for each numbered item in any request)	Movant's theory of why relevant, proportional, etc.	Respondent's theory for why not relevant, proportional, etc.	Responding party's last offered compromise	Moving party's last offered compromise

¹ The Court does not typically record hearings on non-dispositive motions. Counsel desiring the presence of a court reporter should make their own arrangements. If, however, you intend to present evidence for the Court's consideration, please contact the Magistrate Judge's chambers by email (lee_chambers@tned.uscourts.gov) with a copy to all counsel of record (both parties and non-parties) at least 48 hours in advance of the hearing so the Court can arrange for an official court reporter.

As for the conferral ordered herein the above completed chart shall identify the conferring attorneys and the date, type (i.e., in person, by phone, or by video conference), and length of said conferral. Moreover, the joint submission shall be signed by conferring attorneys.

If, after conferral, the issue of Plaintiff's request for an award of attorney's fees in connection with the motion to compel is not resolved, counsel for Plaintiff shall file a brief of no more than five pages with a supporting affidavit addressing that sole issue by no later than December 19, 2022, and Defendant shall have 24 hours in which to file any responding brief and counter affidavit on said sole issue. Any filings on the issue of fees **SHALL** be complete such that the Court can address any remaining fee issues without further briefs or testimony.

SO ORDERED.

ENTER:

s/ Susan K. Lee

SUSAN K. LEE
UNITED STATES MAGISTRATE JUDGE